

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**

Plaintiff,

v.

HMD GLOBAL OY,

Defendant.

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Case No. 2:20-CV-0078-JRG

JURY TRIAL DEMANDED

DECLARATION OF JERRY D. TICE II

I, Jerry D. Tice II, hereby declare as follows:

1. I am an attorney at the law firm of Bragalone Conroy PC in Dallas, Texas. I am counsel of record for CCE in the above-referenced matter. I am admitted to practice in the State of Texas and the Eastern District of Texas. I submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could and would competently testify to the truth of each statement herein.

2. Shown below is a true and correct copy of an excerpt of the website having an address of hmdglobal.com. This excerpt was taken from the website on September 29, 2020. The border was added to more easily distinguish the excerpt.

Our locations

Our team is based around the world across over 50 locations with our headquarters in Espoo, Finland.

Espoo
Bertel Jungin aukio 9
02600 Espoo
Finland

London
Level 4
4 Kingdom Street
Paddington Central
London W2 6BD

Shenzhen
42/F United Headquarters
Mansion, Hi-Tech Zone, 63
Xuefu Road, Nanshan
District, Shenzhen,
Guangdong, China





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Nokia is a registered trademark of Nokia Corporation.
HMD Global Oy is the exclusive licensee of the Nokia brand for phones & tablets.

Language	Nokia phones	Legal	Supplier Code of Conduct	UK compliance
English	Android phones	Privacy Policy	Environmental, Health and Safety Policy	UK Modern Slavery Act Statement
Suomi	Nokia phones support	Terms of Use	Human Rights and Labour Policy	Tax strategy (UK)
简体中文	Nokia phones community	Ethics Code of Conduct	Speak up channel	Anti-Discrimination and Anti-Harassment policy

3. Shown below is a true and correct copy of an excerpt of the website having an address of <https://www.hmdglobal.com/bio/barry-french>. This excerpt was taken from the website on September 29, 2020. The border was added to more easily distinguish the excerpt.

Barry French

Board Director

A veteran of the Nokia brand, Barry French joined the board of HMD in November. As Chief Marketing Officer at Nokia, Barry is responsible for Nokia marketing, communications, government relations, industry analyst relations, and corporate responsibility, as well as employee health, safety and security.

Barry started at Nokia in 2006 and played key roles in the creation of Nokia Siemens Networks and its dramatic turnaround starting in 2011. He was also instrumental in the acquisition of Alcatel-Lucent, the revitalization of the Nokia brand, and the development of a high-performance culture and operating model within Nokia.

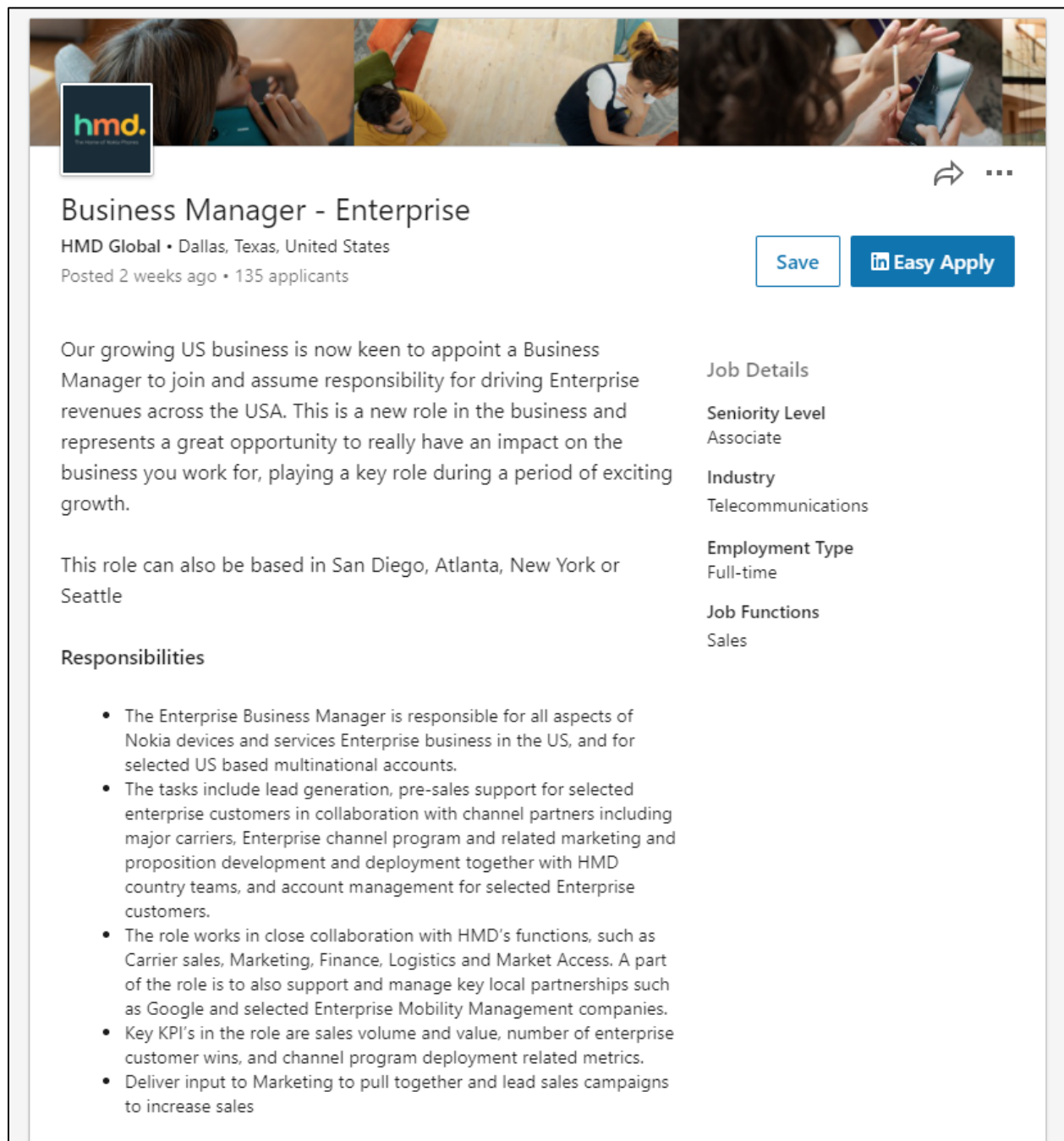
When he took the reins for the Nokia brand in 2014, Barry drove its transformation into a recognized technology innovation leader. He also serves on the Board of Directors of Nokia Shanghai Bell, Nokia's joint venture company in China.

Barry started his career in political consulting, working with clients in the United States and in more than a dozen other countries who were seeking elected office positions or working to build support for significant policy initiatives.


During his career, he has worked at companies including the Sawyer/Miller Group, Dell, Raytheon, and United Airlines. He has a Master's degree in International Affairs from Columbia University's School of International and Public Affairs, New York.

Barry has been married to his wife Karen for almost 30 years. He enjoys running, hiking in the mountains trying to keep pace with his three young-adult children and two golden retrievers. He and his family have lived in Helsinki, London, and are currently settled down Dallas, Texas.

4. Shown below is a true and correct copy of an excerpt of the website having an address of <https://www.linkedin.com/jobs/view/2011663813/?refId=1617289251601416833989>. This excerpt was taken from the website on September 29, 2020. The border was added to more easily distinguish the excerpt.



The image is a screenshot of a LinkedIn job posting for 'Business Manager - Enterprise' at HMD Global. The header features a banner with three photos of people working and the HMD logo. The job title is prominently displayed, followed by the company name and location. There are buttons for 'Save' and 'Easy Apply'. The main text describes the role and its responsibilities. A sidebar on the right lists job details such as seniority level, industry, and employment type. The responsibilities are listed in a bulleted format.



Business Manager - Enterprise

HMD Global • Dallas, Texas, United States

Posted 2 weeks ago • 135 applicants

[Save](#) [Easy Apply](#)

Our growing US business is now keen to appoint a Business Manager to join and assume responsibility for driving Enterprise revenues across the USA. This is a new role in the business and represents a great opportunity to really have an impact on the business you work for, playing a key role during a period of exciting growth.

This role can also be based in San Diego, Atlanta, New York or Seattle

Responsibilities

- The Enterprise Business Manager is responsible for all aspects of Nokia devices and services Enterprise business in the US, and for selected US based multinational accounts.
- The tasks include lead generation, pre-sales support for selected enterprise customers in collaboration with channel partners including major carriers, Enterprise channel program and related marketing and proposition development and deployment together with HMD country teams, and account management for selected Enterprise customers.
- The role works in close collaboration with HMD's functions, such as Carrier sales, Marketing, Finance, Logistics and Market Access. A part of the role is to also support and manage key local partnerships such as Google and selected Enterprise Mobility Management companies.
- Key KPI's in the role are sales volume and value, number of enterprise customer wins, and channel program deployment related metrics.
- Deliver input to Marketing to pull together and lead sales campaigns to increase sales

Job Details

Seniority Level
Associate

Industry
Telecommunications

Employment Type
Full-time

Job Functions
Sales

5. Shown below is a true and correct copy of an excerpt of a September 28, 2020 letter from counsel for HMD to counsel for CCE. The border was added to more easily distinguish the excerpt.

2. Potential Expedited Discovery Regarding Transfer

Your letter misstates our view on expedited discovery regarding our transfer motion, so we will state it again: although HMD Global does not believe that expedited discovery is necessary regarding our motion to transfer, and that the Court can and should grant our motion based on what we have presented so far, in response to CCE's request for expedited discovery regarding our transfer motion, we indicated that we would be willing to avoid burdening the Court with motion practice by agreeing to limited expedited discovery applicable to both CCE and HMD Global. Of course, discovery regarding transfer cannot interfere with discovery regarding standing, which must take precedence as a jurisdictional issue. Although a sensible allocation of resources would put standing discovery ahead of transfer discovery, as a compromise and to avoid motion practice, we are willing to do both of them at the same time.

We stand by our previous offer to avoid motion practice by agreeing to expedited discovery regarding transfer, which each side limited to two document requests, two interrogatories and four hours of 30(b)(6) deposition testimony on the issues raised by the pending motion to transfer and declarations in support thereof. These issues are well defined, and further discovery would appear to be solely for the purpose of adding expense to the litigation. In addition, since you have raised the issue, we should confirm that while we can discuss an agreement including interrogatories and a 30(b)(6) notice to HMD Global, we cannot say the same for HMD America, Inc. CCE chose not to include HMD America as a party to this litigation, and that choice has consequences, among them that CCE cannot serve interrogatories on HMD America, but must seek documents or testimony through a subpoena, as we have done with Acacia Research Corporation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 30, 2020

/s/ Jerry D. Tice II
Jerry D. Tice II